

UNITED STATES DISTRICT COURT **FILED**

for the

January 29, 2024

Western District of Texas

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXASUnited States of America
vsBY: Cecie Rodriguez
DEPUTYDEFENDANT #1 Bryan Manuel SALCIDO
DEFENDANT #2 Omar RODRIGUEZ

Case No.

EP:24MJ 364 ATBDefendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 25, 2024 in the county of El Paso in the
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*Charge 1: 8 U.S.C.1324 (a)(1)(A)(v)(I),
(a)(1)(A)(ii) and (a)(1)(B)(i)

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed together, and with others known and unknown, to commit offenses against the United States, namely: knowing and in reckless disregard of the fact that an alien has come to, entered, and remained in the United States in violation of law, did transport, move, or attempt to transport and move such alien within the United States by means of transportation and otherwise, in furtherance of said violation of law.

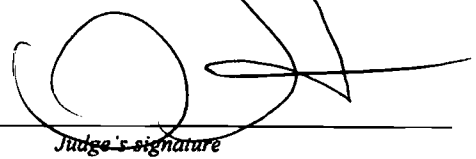
This criminal complaint is based on these facts:

Charge #1: DEFENDANT #1 Bryan Manuel SALCIDO
Charge #1: DEFENDANT #2 Omar RODRIGUEZ

Continued on the attached sheet.

*Complainant's signature*Matthew Miller, Border Patrol Agent*Printed name and title*

Sworn to before me and signed in my presence.

Date: January 29, 2024*Judge's signature*City and state: El Paso, TexasAnne T. Berton U.S. Magistrate Judge*Printed name and title*

Complaint sworn to telephonically on

January 29, 2024at 1:33 PM and signed
electronically. FED.R.CRIM.P. 4.1(b)(2)(A)

CONTINUATION OF CRIMINAL COMPLAINT

WESTERN DISTRICT OF TEXAS

Defendant #1 Bryan Manuel SALCIDO

Defendant #2 Omar RODRIGUEZ

PEPT# PEPT240100306

01/29/2024

FACTS (CONTINUED)

On January 25, 2023, a Border Patrol Agent assigned to the El Paso Texas Border Patrol Station saw suspected illegal aliens making an illegal entry into the United States by climbing over the K2 border fence near an area that is known to Border Patrol Agents as the pumphouse. As the agent responded to the area he saw a white Ford Explorer that was stopped, and the suspected illegal aliens were entering the vehicle.

In the agents' experience, this area along Paisano Dr., is used daily by alien smuggling organizations to pick up illegal aliens and further their entry into the United States given its close proximity to the international border. Border Patrol agents have developed many smuggling cases and made numerous arrests which originated from this area.

A short distance later, along Paisano Dr., the agent conducted a vehicle stop of the white Ford Explorer along Paisano Dr. near the area where the agent saw the illegal entry and load up. The vehicle pulled over and as the agent approached it, the driver, later identified as, Brayan Manuel SALCIDO, DEFENDANT 1, drove away in an attempt to abscond from the agent.

The agent followed the Ford Explorer and notified other Border Patrol Agents of the vehicle description and direction of travel. The Ford Explorer came to a stop in some heavy traffic near the intersection of Hawthorne St. and West Schuster Ave. which is in the Western District of Texas. As the vehicle was stopped, agents saw some individuals then exit the vehicle and started running away from the area. One agent approached the vehicle identified himself as a Border Patrol Agent and questioned the driver, later identified as Bryan Manuel SALCIDO, DEFENDANT 1 as to his citizenship. It was determined that DEFENDANT 1 is a United States citizen.

An agent notified other agents in the area of the clothing description and direction of travel of the individuals that ran from the vehicle. A short time later, agents saw two individuals matching the description of the absconders, one of which was muddy from the knees down. An agent approached the individuals near the intersection of Lawton Dr. and W. Yandell Dr. and identified himself as a Border Patrol Agent. In doing so, the individuals began to run away from the agent. After a brief struggle, agents were able to detain one of the individuals (passenger white Ford Explorer) later identified as Omar RODRIGUEZ, DEFENDANT 2. DEFENDANT 2 was determined to be a United States Citizen, both DEFENDANTS were placed under arrest and transported to the Paso Del Norte Border Patrol Processing Center.

In a post-Miranda interview, DEFENDANT 1 admitted to knowing that the individual he and DEFENDANT 2 picked up and transported is an illegal alien. DEFENDANT 1 also admitted he agreed with a known smuggler to pick up and transport illegal aliens, and in exchange he was to be paid \$450.00 per illegal alien. DEFENDANT 1 also admitted that DEFENDANT 2 helps with the alien smuggling schemes and he pays half of the money he gets paid to DEFENDANT 2. DEFENDANT 1 claims to have transported illegal aliens several

CONTINUATION OF CRIMINAL COMPLAINT

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FACTS (CONTINUED)

times in the past.

In a post-Miranda interview, DEFENDANT 2 admitted to knowing the people he and DEFENDANT 1 were picking up, are illegal aliens. He also claimed that in agreement with DEFENDANT 1, DEFENDANT 1 was going to pay him half the money collected in exchange for helping with the alien smuggling scheme. DEFENDANT 2 also admitted they were supposed to pick up a bunch of illegal aliens but only one got into the vehicle. He also admitted he knew it is against the law to transport illegal aliens.

Because this affidavit is being submitted for the limited purpose of establishing probable cause as set forth herein, I have not included each and every fact known to me concerning this investigation.

Immigration History:

Defendant #1 None

Defendant #2 None

Criminal History:

Defendant #1 None

Defendant #2 None